

**THE ATKIN FIRM, LLC**

Formed in the State of New Jersey

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*Attorneys for Plaintiff Strike 3 Holdings, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JOHN DOE subscriber assigned IP  
address 74.102.72.115,

Defendant.

Case No. 2:24-cv-10759-EP-JRA

**NOTICE OF MOTION  
FOR EXTENSION OF TIME  
WITHIN WHICH TO  
EFFECTUATE SERVICE**

**TO: ALL COUNSEL OF RECORD IN THE ABOVE CAPTIONED  
MATTER**

**PLEASE TAKE NOTICE** that on April 7, 2025, at 9:30 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Strike 3 Holdings, LLC (“Plaintiff”) will move before the Honorable Jose R. Almonte, U.S.M.J., of the United States District Court for the District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ

07102, for an Order granting an extension of time within which to effectuate service of process in this matter, pursuant to Federal Rule of Civil Procedure 4(m).

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 7.1(d)(4), Plaintiff states that no brief is necessary because Plaintiff will rely upon the Certification of John C. Atkin, Esq., to explain the lack of service to date and show good cause for the requested extension, submitted herewith; any reply papers in support of this Motion; and oral argument, if any.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 7.1(e), a proposed form of order is also submitted herewith for the Court's consideration.

DATED: February 24, 2025

Respectfully submitted,

**THE ATKIN FIRM, LLC**

*Attorneys for Plaintiff,  
Strike 3 Holdings, LLC*

By: /s/ John C. Atkin, Esq.  
JOHN C. ATKIN